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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10964 (MG)
)
) (Jointly Administered)
)

**DECLARATION OF OREN BLONSTEIN, HEAD OF INNOVATION AND CHIEF
COMPLIANCE OFFICER OF CELSIUS NETWORK LIMITED, WITH RESPECT
TO CERTAIN PHASE I ISSUES PURSUANT TO THE JOINT STIPULATION AND
AGREED SCHEDULING ORDER BY AND AMONG THE DEBTORS, THE
COMMITTEE, AND THE AD HOC GROUPS WITH RESPECT TO THE CUSTODY
AND WITHHOLD ISSUES**

I, Oren Blonstein, Head of Innovation and Chief Compliance Officer of Celsius Network Limited (together with the above-captioned debtors and debtors in possession, the “Debtors”) and certain of its Debtor affiliates (collectively, with their non-Debtor Affiliates, “Celsius” or the “Company”), hereby declare under penalty of perjury:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

1. I am the Head of Innovation and Chief Compliance Officer of Celsius Network Limited and certain of its subsidiaries. I have held the position of Head of Innovation since February 2021 and Chief Compliance Officer since September 2021. I have worked for over twenty years in product management, operations, and compliance roles. Immediately prior to joining Celsius, I served as an Advisor to Ava Labs, the operator of the Avalanche blockchain and smart contract platform and issuer of the AVAX token. Previously, I also served as Product, Operations, and Compliance Consultant at several FinTech and Crypto companies. I also served in several capacities at HBUS, the operator of the Huobi U.S. digital currency trading platform, from January 2019 to December 2019, with my final position being Chief Executive Officer, and Acting Chief Compliance Officer. Prior to that, I also served in several capacities at Tora Trading Services, a provider of advanced investment management technologies for trading and portfolio management companies, with my final position being Managing Director, Product Management & Production Support, from August 2006 to January 2019.

2. I am generally familiar with the Debtors' day-to-day operations, business, and custody and withhold services. Except as otherwise indicated, all facts in this declaration are based upon my personal knowledge, my discussions with other members of Celsius' management team and advisors, my review of relevant documents and information concerning Celsius' operations, or my opinions based upon my experience and knowledge. I am over the age of 18 and authorized to submit this declaration on behalf of the Debtors. If called upon to testify, I could and would testify competently to the facts set forth in this declaration.

3. This declaration is submitted in connection with the briefing of certain Phase I Issues pursuant to the *Joint Stipulation and Agreed Scheduling Order By and Among the Debtors, the Committee, and the Ad Hoc Groups With Respect to the Custody and Withhold Issues* [Docket

No. 1044] (the “Scheduling Order”).² Part A to Part E of this declaration provide general explanations of the topics listed at paragraph 7 of the Scheduling Order. Unless otherwise indicated, all explanations herein describe Celsius’ operations as they were undertaken between the launch of the Custody Program on April 15, 2022 and the pause of Celsius’ operations on June 12, 2022 (the “Pause”).

a. How and when the custody and withhold wallets were created.

4. On April 15, 2022, the Debtors began providing the Custody Program to certain users located in the United States. Users eligible for the Custody Program could use the Custody Program to move digital assets from Celsius’ Custody Program to other service offerings by the Company.³ For example, an accredited user or qualified institutional buyer could move cryptocurrency from the Custody Program to Celsius’ earn service (the “Earn Program”) to earn certain rewards. Similarly, a US customer residing in a state where Celsius offered loans could move cryptocurrency from the Custody Program to Celsius’ borrowing program (the “Borrow Program”) pursuant to which users could take out a fiat or stablecoin loan from Celsius.⁴ Digital assets transferred in the Custody Program were (in the aggregate) maintained in separate custody wallets (each, a “Custody Wallet”) on Fireblocks. The wallets used as Custody Wallets were pre-existing wallets that had remained mostly unused since their creation. In early 2022, in preparation for the launch of the Custody Program, this set of wallets was designated to be used for the Custody Program.

5. When the Debtors launched the Custody Program, the Debtors did not offer the Custody Program in nine states (the “Prohibited States”). There were nevertheless residents of

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed thereto in the Scheduling Order.

³ See Terms of Use at 11.

⁴ See *id.* at 13.

Prohibited States who attempted to transfer cryptocurrency to the Custody Program from an external platform. Due to the nature of cryptocurrency transfers on the blockchain, it was impossible to halt those transfers from residents of Prohibited States who already had a Celsius wallet address used to transfer cryptocurrency to Celsius' platform (prior to the launch of the Custody Service). These circumstances led the Debtors to use "withhold" accounts (the "Withhold Accounts") to keep such digital asset transfers distinct from assets relating to those in the Custody Program or the Earn Program.

6. Withhold Accounts also existed before the Custody Program. Specifically, prior to the launch of the Custody Program, Withhold Accounts were used to track cryptocurrency transferred to the Celsius platform that were not eligible for any given service and not supported on the platform. For instance, if customers (wherever located) transferred BNB coins (*i.e.*, the Binance token) to the Celsius platform, those transfers would be reflected in the customers' Withhold Accounts because that coin was not eligible for the Earn Program for any customer in the United States.

7. Digital assets transferred to Celsius' platform that were associated with a Withhold Account were not held in any specific "Withhold Wallet" but, rather, were transferred into Celsius' wallets and used across Celsius' platform along with other digital assets transferred to Celsius' platform. For this reason, "Withhold Wallet" is a misnomer, and there is no single date when "Withhold Wallets" were created.

b. Whether the custody and withhold wallets have only ever held custody and withhold coins, respectively, and whether the custody and withhold wallets include coins that have been designated as pledged collateral.

8. Digital assets in the Custody Program were maintained in separate Custody Wallets distinct from the Celsius' main aggregator/omnibus wallets (the "Aggregator Wallets"). As further explained below, any digital assets transferred to Celsius' platform were typically initially swept

into Celsius' main wallets and thereafter commingled within Celsius' Fireblocks infrastructure, and no single individual coin was attributable to any specific customer. Rather, the Company's internal system for tracking customer account balances was based on a ledger that accounted for increases and decreases in a customer's account balances based on that customer's activity—not the actual movement of coins in Celsius' Fireblocks wallets. As a result, any transfer of digital assets to or from the Custody Program by a customer would not necessarily be met by an immediate and corresponding transfer of coins between or from Custody Wallets. Custody Wallets have only ever held digital assets that were intended by customers (on an aggregated basis) to be in the Custody Program.⁵

9. Additionally, where a customer decided to use cryptocurrency credited to their Custody account as collateral for a loan under the Borrow program, the applicable amount of cryptocurrency was deducted from such customer's Custody account balance. Upon using that cryptocurrency as collateral for a loan, such collateral was not reflected in a Custody account.

10. As noted above, digital assets transferred to Celsius' platform that were associated with a Withhold Account were not held in any specific "Withhold Wallet" and were not treated differently than other digital assets transferred to Celsius' platform. For this reason, no "Withhold Wallet" existed, and no "Withhold Wallet" could ever hold coins designated as pledged collateral.

⁵ The Company historically endeavored to also hold a certain amount (or "buffer") of digital assets in Custody Wallets, on a per coin basis, in excess of Custody liabilities in Custody Accounts to ensure enough assets were available to satisfy withdrawal requests in between the daily balance reconciliation, which is further described below.

c. The process by which coins were transferred in and out of custody and withhold wallets.

11. As discussed, a customer request to transfer a particular digital asset balance to or from that customer's Custody account did not immediately nor necessarily result in a movement of coins on the blockchain.

12. Specifically, upon a user's request to transfer digital asset balances between Celsius' programs, Celsius processed such request by adjusting the corresponding liability on Celsius' books to reflect the intended transfer. In other words, Celsius used its internal ledger system to track customer account balances. In the case of requests to withdraw digital assets from Celsius' platform, such coin movements were generally processed automatically. In instances where (a) the Company had anti-money laundering, security, or fraud concerns, or (b) either a single withdrawal request or a customer's aggregate withdrawal requests in a single day were for digital assets of a value above a certain threshold, the withdrawal request was subject to a manual verification for security purposes.

13. Additionally, the Company's internal system was tied to its ledger that was maintained on an aggregate basis. As a result, any transfer of digital assets to or from the Custody Program by a customer would not necessarily be met by a corresponding transfer of coins to or from Custody Wallets. Instead, the Company periodically rebalanced Custody Wallets in an effort to ensure that Custody Wallets collectively held digital assets equal to or in excess of the balance of each type of cryptocurrency in the Custody Program (on an aggregated basis) as reflected in the Company's internal ledger.⁶ As such, digital assets were moved on the blockchain, to or from Custody Wallets, only if such movement was necessary to maintain the requisite number of coins

⁶ As previously explained, the Company historically endeavored to hold a certain amount (or "buffer") of digital assets in Custody Wallets, on a per coin basis, in excess of Custody liabilities in Custody Accounts to ensure enough assets were available to satisfy withdrawal requests in between the daily balance reconciliation.

in Custody Wallets on an aggregate basis.⁷ In the event a transfer to Custody Wallets was necessary to satisfy the periodic settlement of Custody assets with Custody liabilities, the Company transferred digital assets to Custody Wallets using coins in the Aggregator Wallets. In turn, if coins in the Aggregator Wallets were not sufficient, Celsius would then work to source additional digital assets into the Aggregator Wallets, including by unwinding deployment activities.

14. As noted above, digital assets transferred to Celsius' platform that were associated with a Withhold Account were not held in any specific "Withhold Wallet," and accordingly, that portion of the request is not addressed in the below subparts.

i. Transfer into custody and withhold wallets.

15. After the launch of the Custody Program, U.S. customers who did not reside in a Prohibited State were automatically enrolled in the Custody Program. Additionally, non-accredited U.S. users were not permitted to transfer new amounts to the Earn program. Any digital assets that were transferred to Celsius after April 15, 2022, by non-accredited U.S. users residing in Prohibited States were reflected in Withhold Accounts.

16. Upon transfer of a customer's digital assets to the Company from such customer's digital wallet outside of the Company's architecture (*i.e.*, either a customer's own wallet or a third-party wallet at Coinbase, FTX, etc.), the Company received the transferred digital assets in an individualized cryptocurrency intake wallet (also known as a bridge wallet) that was owned by the

⁷

Following the Pause, Celsius discovered that there was a mismatch between the amount of digital assets in Custody Wallets and the balances of customer Custody accounts on an aggregated basis due to, among other things, the quantum of transactions leading up to the Pause and the manual nature of the reconciliation process in which assets were rebalanced on a periodic basis. Although Celsius added a certain number of digital assets in Custody Wallets to address that mismatch, before assets and liabilities were fully reconciled, Celsius separately made the decision to "freeze" certain of their Fireblocks workspaces (including the Custody workspace) for security reasons. Accordingly, as of October 21, 2022, there remains a discrepancy of approximately \$15 million between the digital assets in the Custody Wallets (approximately \$193 million) and the balances of customer Custody accounts on an aggregated basis (approximately \$208 million).

Company but associated internally with the customer's account with Celsius (a "Customer Associated Wallet"). All customer transfers were initially received into Customer Associated Wallets, regardless of whether the account was a new or established account. One Customer Associated Wallet was created per user per type of cryptocurrency transferred.⁸

17. Next, at periodic intervals, digital assets in Customer Associated Wallets in an amount greater than a *de minimis* value were "swept" to, or transferred to, the Company's Aggregator Wallets on a per cryptocurrency basis. Cryptocurrencies received from customers via their respective Customer Associated Wallets, when transferred to the applicable Aggregator Wallet, were then commingled with other digital assets in the applicable Aggregator Wallet.

18. Once digital assets were transferred into Customer Associated Wallets to be then transferred to the Aggregator Wallets, the Company regularly reconciled its internal ledger. If, during the periodic reconciliation, the Company's internal ledger reflected changes in the aggregated balance of assets in Custody accounts, the Company transferred coins into coin-specific Custody Wallets to maintain the requisite number of coins in Custody Wallets on an aggregate basis. Thereafter, the Company would be able to draw upon digital assets from the Aggregator Wallets or the coin-specific Custody Wallets (first passing through the Aggregator Wallets) to be used on the platform, solely to the extent it was consistent with the internal ledger as to the amount of digital assets to be held as Custody assets. Additionally, digital assets in the Aggregator Wallets or excess digital assets in Custody Wallets after the regular re-balancing could be moved to various destinations for the Company's business needs, including to be deployed. The Company also

⁸ Customer Associated Wallets on certain blockchains can support multiple types of cryptocurrencies (*e.g.*, wallets on the Ethereum blockchain support Ether as well as other ERC-20 compatible cryptocurrencies), in which case a single Customer Associated Wallet can be used to receive transfers from the same user across multiple cryptocurrency types.

historically maintained certain amounts of cryptocurrencies in the Aggregator Wallets to facilitate customer withdrawals.

ii. Transfer out of custody and withhold wallets.

19. Because no single individual coin on Celsius’ platform is attributable to any given customer, a request to move digital assets from the Custody Service was satisfied (in the aggregate) using any digital asset available for that purpose with Celsius.⁹ Digital assets on the Company’s platform or deployed by the Company were moved to satisfy such requests on an aggregate basis typically as follows.

20. In the case of requests for withdrawals, coins were first pulled from Celsius’ “frictional” wallets (the “Frictional Wallets”). Frictional Wallets were fully automated wallets from which all withdrawals to external wallets were processed and that served as an intermediary step between the Aggregator Wallets and customers’ external wallets. If coins in Frictional Wallets were not sufficient to process a withdrawal, coins were moved from the Aggregator Wallets into the Frictional Wallets to process withdrawal requests. Finally, if the Aggregator Wallets did not contain sufficient coins to process a withdrawal request, the Company could unwind certain deployment activities to return coins to Celsius’ platform sufficient to meet the balance of these requests.

21. Following the launch of the Custody Service on April 15, 2022, all withdrawals to external wallets by customers residing in states other than the Prohibited States were reflected in the customer’s Custody account. For instance, if a customer was owed cryptocurrency transferred to Celsius under the Earn Program, the user first had to request a transfer from the Earn Program

⁹ For that reason, when a customer withdrew a digital asset from Celsius’ platform, such customer did not receive the same unique coin it had initially transferred to the Company but, rather, an equivalent amount of such crypto in-kind.

to the Custody Program. Only then could the customer request to withdraw digital assets from the platform. Because the Company's ledger worked on an aggregate basis, however, for the reasons previously discussed, these coins would have been withdrawn from the Frictional Wallets rather than directly from the Custody Wallets. The change in the user's Custody account balance would then be aggregated with other changes during the periodic re-balancing of the Custody Wallets.

d. The balance of assets in custody and withhold accounts and custody and withhold liabilities in the (10) days before and after the pause by coin.

22. **Exhibit A** hereto reflects digital assets in Custody Wallets and balances by coin of custody and withhold liabilities reflected in Custody accounts and Withhold accounts, respectively, in each case, during the 10 days before and after the Pause.¹⁰ As noted above, digital assets transferred to Celsius' platform that were associated with a Withhold Account were not held in any specific "Withhold Wallet."

e. The number and types of coins that are currently in custody and withhold wallets as a step in an unsuccessful attempt to withdraw coins off the platform (to the extent ascertainable).

23. As of the date hereof, there are no coins that are in Custody Wallets as a step in an unsuccessful attempt to withdraw coins off the platform. And as noted above, digital assets transferred to Celsius' platform that were associated with a Withhold account were not held in any specific "Withhold Wallet."

24. In the week leading up to the Pause, there were 55 requests for withdrawals of coins located in the Custody Program or Withhold Accounts that were not completed by the time the Company effectuated the Pause (collectively, the "Pending Withdrawals").

¹⁰ The balances reflected in **Exhibit A** were generated based on Freeze reports which were generated on Mondays, Wednesdays, and Fridays. As such, the Company did not have a process set up to record custody assets during each day of the 10-day period before and after the Pause.

25. The Company has since determined that affected customers' balances no longer showed the balance of the coins associated with the Pending Withdrawal. Because these customers had not received such balance in their external wallets (since their withdrawal request had not been completed), the Company cancelled these Pending Withdrawals on or before October 5, 2022, so that customer balances would accurately reflect the amount owed to the customer. Upon cancellation, balances subject to the Pending Withdrawals were returned to the account they had initially originated from.

26. Attached as **Exhibit B** hereto is the number of coins by type of coin that were subject to the Pending Withdrawals at the time of the Pause and prior to such Pending Withdrawals being cancelled.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: October 25, 2022

/s/ Oren Blonstein

Name: Oren Blonstein

Title: Head of Innovation and Chief

Compliance Officer, Celsius Network Limited

Exhibit A

Coin	Price	6/3/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$172,906,251	-\$156,865,889	-\$8,288,753
1INCH	0.87	54,434	-26,428	-1,211
AAVE	106.95	2,883	-1,738	-89
ADA	0.57	7,976,941	-6,912,366	-112,143
AVAX	23.15	31,107	-23,167	-716
BADGER	5.79	0	-81	0
BAT	0.38	215,861	-181,600	-4,638
BCH	183.55	755	-592	-26
BNB	297.47	408	-62	-6
BNT	1.19	10,191	-9,264	-3,538
BSV	54.97	615	-487	-3
BTC	29,686.17	2,455	-2,471	-111
BUSD	1.00	414,676	-98,377	-1,483
CEL	0.81	1,717,559	-1,083,267	-400,950
COMP	56.22	748	-656	-33
CRV	1.19	0	-3,403	0
DASH	58.75	1,769	-1,323	-14,379
DOGE	0.08	4,379,467	-3,575,438	-55,674
DOT	9.40	126,212	-105,415	-3,231
EOS	1.26	54,792	-27,073	-5,365
ETC	21.96	5,605	-6,644	-57
ETH	1,760.50	18,174	-16,980	-1,044
GUSD	1.00	2,799,361	-1,789,309	-6,861
KNC	1.92	57,580	-43,871	-160,577
LINK	6.83	344,071	-268,193	-6,019
LPT	11.88	2,611	-896	0
LTC	62.24	12,916	-10,502	-3,889
LUNA	0.00	26,188,786	-30,752,106	-3,566
MANA	0.98	297,956	-153,971	-7,226
MATIC	0.59	5,355,662	-4,290,101	-192,197
MCDAI	1.00	1,286,589	-529,972	-2,087
MKR	1,144.34	0	-19	0
OMG	2.41	5,893	-4,416	-47
PAX	1.00	303,098	-258,551	-65
PAXG	1,857.96	331	-171	-2
SGB	0.04	1,126,459	-1,013,055	-4,261
SNX	2.71	188,086	-154,833	-2,271
SOL	38.34	55,814	-49,917	-4,917
SPARK	0.00	0	-216,179	-9,576
SUSHI	1.55	47,266	-10,123	-507
TAUD	0.72	1,797	0	0
TCAD	0.79	3,061	-6	0
TGBP	1.25	129,397	-77,578	0
THKD	0.13	41,275	0	0
TUSD	1.00	282,120	-256,176	-519
UMA	3.08	5,529	-1,412	-249
UNI	5.10	42,491	-31,353	-2,200
USDC	1.00	37,420,047	-30,303,907	-796,125
USDT ERC20	1.00	2,958,828	-2,837,909	-41,584
UST	0.02	1,065,295	-666,775	0
WBTC	29,676.00	10	0	0
XEC	0.00	0	0	0
XLM	0.14	2,460,428	-2,285,599	-78,966
XRP	0.39	3,839,869	-3,320,633	-62,949
XTZ	1.91	36,350	-25,479	-125
YFI	7,413.88	0	0	0
yveCRV-DAO	0.91	0	0	0
ZEC	89.33	4,754	-1,702	-132
ZRX	0.40	217,050	-197,137	-11,551
ZUSD	1.01	1	0	0

		6/6/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
Coin	Price	\$189,913,881	-\$176,853,699	-\$9,213,071
1INCH	0.87	54,434	-28,082	-1,262
AAVE	105.10	2,883	-1,878	-77
ADA	0.60	7,976,941	-6,649,684	-101,477
AVAX	25.51	31,107	-22,041	-670
BADGER	5.97	0	0	0
BAT	0.40	215,861	-172,544	-4,638
BCH	183.05	755	-524	-25
BNB	294.72	408	-62	-6
BNT	1.29	10,191	-8,961	-3,559
BSV	57.45	615	-493	-3
BTC	31,433.96	2,718	-2,497	-112
BUSD	1.00	414,676	-138,362	-1,483
CEL	0.70	1,717,559	-1,068,998	-402,678
COMP	58.83	748	-709	-35
CRV	1.27	0	-3,035	0
DASH	60.08	1,769	-1,390	-14,422
DOGE	0.08	4,379,467	-3,502,788	-56,791
DOT	9.46	126,212	-100,258	-3,340
EOS	1.30	54,792	-27,745	-5,365
ETC	22.25	7,309	-6,440	-56
ETH	1,861.89	18,679	-24,255	-1,072
GUSD	1.00	2,799,361	-1,882,517	-7,021
KNC	1.93	57,580	-45,735	-160,641
LINK	7.76	344,071	-276,166	-5,926
LPT	12.47	2,611	-915	0
LTC	64.03	12,916	-11,104	-3,820
LUNA	0.00	26,188,786	-30,969,663	-3,556
MANA	1.00	297,956	-161,190	-5,762
MATIC	0.62	5,355,662	-4,220,711	-174,544
MCDAI	1.00	1,286,589	-542,233	-4,695
MKR	1,202.93	0	-18	0
OMG	2.53	5,893	-4,425	-47
PAX	1.00	303,098	-259,596	-32
PAXG	1,845.82	331	-304	-2
SGB	0.04	1,126,459	-1,095,673	-3,716
SNX	2.71	188,086	-153,387	-2,311
SOL	42.05	55,814	-50,428	-1,169
SPARK	0.00	0	-216,179	-9,578
SUSHI	1.59	47,266	-9,131	-507
TAUD	0.72	1,797	0	0
TCAD	0.79	3,061	-6	0
TGBP	1.25	129,397	-77,578	0
THKD	0.13	41,275	0	0
TUSD	1.00	282,120	-257,774	-549
UMA	3.10	5,529	-1,419	-249
UNI	5.26	42,491	-20,550	-1,800
USDC	1.00	37,420,047	-29,813,185	-1,493,383
USDT ERC20	1.00	3,121,700	-1,916,344	-40,406
UST	0.02	1,065,295	-673,901	0
WBTC	31,458.00	10	0	0
XEC	0.00	0	0	0
XLM	0.14	2,514,158	-2,088,878	-78,439
XRP	0.40	3,839,869	-3,264,471	-65,670
XTZ	2.03	36,350	-29,799	-125
YFI	7,405.50	0	0	0
yveCRV-DAO	0.95	0	0	0
ZEC	92.96	9,508	-1,790	-135
ZRX	0.42	217,050	-186,295	-11,610
ZUSD	1.00	1	0	0

		6/8/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
Coin	Price	\$189,538,093	-\$171,819,552	-\$7,979,435
1INCH	0.83	31,221	-29,735	-1,262
AAVE	96.91	2,097	-1,934	-77
ADA	0.64	6,666,384	-6,348,938	-105,514
AVAX	24.22	25,188	-23,989	-704
BADGER	5.65	0	0	0
BAT	0.40	178,914	-170,395	-4,638
BCH	178.32	558	-532	-23
BNB	288.81	65	-62	-6
BNT	1.28	8,556	-8,149	-864
BSV	56.90	517	-493	-3
BTC	30,223.13	2,520	-2,400	-102
BUSD	1.00	107,595	-99,625	-1,483
CEL	0.66	1,184,948	-1,097,174	-402,804
COMP	55.82	672	-640	-21
CRV	1.16	3,744	-3,916	0
DASH	58.12	1,470	-1,400	-14,379
DOGE	0.08	3,960,696	-3,772,092	-57,238
DOT	9.05	115,871	-107,288	-3,239
EOS	1.26	27,257	-25,238	-3,999
ETC	21.30	7,272	-6,733	-56
ETH	1,799.25	26,680	-25,268	-982
GUSD	1.00	1,890,910	-1,800,867	-6,450
KNC	1.89	46,955	-43,476	-160,641
LINK	8.65	283,530	-270,029	-5,706
LPT	12.39	1,215	-1,125	-21
LTC	62.10	14,160	-13,486	-3,794
LUNA	0.00	26,188,786	-31,127,113	-3,556
MANA	0.99	297,956	-156,346	-6,283
MATIC	0.61	5,355,662	-4,414,728	-188,507
MCDAI	1.00	1,286,589	-576,109	-4,691
MKR	1,156.26	0	-19	0
OMG	2.62	5,893	-5,367	-47
PAX	1.01	303,098	-261,062	-32
PAXG	1,858.94	334	-288	-2
SGB	0.04	1,126,459	-1,105,703	-3,716
SNX	2.65	188,086	-156,529	-2,141
SOL	38.85	55,814	-49,060	-1,118
SPARK	0.00	0	-228,666	-9,581
SUSHI	1.50	47,266	-9,835	-410
TAUD	0.72	1,797	0	0
TCAD	0.80	3,061	-6	0
TGBP	1.25	129,397	-77,578	0
THKD	0.13	41,275	0	0
TUSD	1.00	283,572	-262,879	-549
UMA	2.98	5,529	-1,312	-249
UNI	5.10	42,491	-22,665	-1,714
USDC	1.00	37,420,047	-30,330,869	-995,462
USDT ERC20	1.00	3,121,700	-1,863,949	-40,082
UST	0.01	1,065,295	-716,120	0
WBTC	30,266.00	10	0	0
XEC	0.00	0	0	0
XLM	0.14	2,514,158	-2,132,169	-80,668
XRP	0.40	3,839,869	-3,299,545	-63,514
XTZ	2.12	36,350	-30,131	-125
YFI	7,468.12	0	0	0
yveCRV-DAO	0.92	0	0	0
ZEC	92.26	0	-1,784	-132
ZRX	0.40	0	-162,852	-7,460
ZUSD	0.99	0	0	0

Coin	Price	6/10/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$174,313,021	-\$168,252,348	-\$6,060,673
1INCH	0.76	31,221	-30,463	-2,725
AAVE	87.19	1,975	-2,134	-97
ADA	0.58	6,737,277	-4,826,624	-121,307
AVAX	22.49	23,156	-23,291	-930
BADGER	4.66	0	0	0
BAT	0.37	178,914	-190,393	-7,940
BCH	168.86	588	-589	-24
BNB	285.14	65	-62	-6
BNT	1.21	8,556	-8,700	-864
BSV	57.53	438	-422	-3
BTC	29,028.75	2,548	-2,447	-106
BUSD	1.00	107,595	-126,669	-4,781
CEL	0.46	1,178,040	-1,121,241	-403,651
COMP	51.36	672	-695	-26
CRV	1.03	3,744	-5,682	0
DASH	54.18	1,447	-1,361	-14,437
DOGE	0.08	3,742,966	-3,611,158	-57,909
DOT	8.73	122,329	-115,912	-4,026
EOS	1.19	27,257	-24,592	-4,006
ETC	20.13	4,938	-6,795	-56
ETH	1,673.41	27,170	-25,126	-1,084
GUSD	1.00	1,883,532	-1,861,045	-8,544
KNC	1.77	44,831	-41,459	-160,644
LINK	8.34	281,981	-382,527	-12,920
LPT	11.27	1,021	-932	0
LTC	56.81	13,647	-13,390	-3,771
LUNA	0.00	26,188,786	-31,142,194	-3,556
MANA	0.91	164,163	-156,122	-6,284
MATIC	0.60	4,790,577	-4,719,843	-224,246
MCDAI	1.00	537,565	-446,348	-34,676
MKR	1,052.68	0	-3	0
OMG	2.50	5,893	-5,178	-49
PAX	1.00	279,899	-265,527	-32
PAXG	1,875.32	308	-284	-2
SGB	0.04	1,126,459	-1,176,886	-3,716
SNX	2.49	154,363	-152,925	-2,530
SOL	37.37	50,513	-49,040	-1,184
SPARK	0.00	0	-258,236	-9,581
SUSHI	1.39	10,327	-11,856	-1,419
TAUD	0.71	0	0	0
TCAD	0.78	6	-6	0
TGBP	1.23	81,457	-77,578	0
THKD	0.13	0	0	0
TUSD	1.00	276,023	-262,066	-549
UMA	2.81	1,378	-1,820	-249
UNI	4.85	23,799	-24,064	-2,130
USDC	1.00	31,625,030	-32,535,451	-1,025,927
USDT ERC20	1.00	1,785,469	-1,707,355	-53,137
UST	0.01	751,920	-716,208	0
WBTC	28,982.00	0	-4	0
XEC	0.00	0	0	0
XLM	0.13	2,204,564	-2,266,460	-76,633
XRP	0.38	3,413,682	-3,338,423	-69,623
XTZ	2.04	31,638	-29,771	-459
YFI	7,067.03	0	-2	0
yveCRV-DAO	0.87	0	0	0
ZEC	87.50	2,431	-2,338	-132
ZRX	0.36	179,878	-164,112	-7,530
ZUSD	0.99	1	0	0

Coin	Price	6/13/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$147,356,993	-\$216,074,037	-\$14,970,401
1INCH	0.61	31,221	-36,110	-1,913
AAVE	61.01	2,041	-4,034	-179
ADA	0.48	5,067,955	-8,303,162	-240,588
AVAX	16.50	23,156	-41,197	-986
BADGER	3.56	0	-84	0
BAT	0.29	199,913	-2,378,482	-16,291
BCH	132.95	618	-1,098	-34
BNB	227.91	62	-62	-6
BNT	0.90	8,556	-9,451	-927
BSV	46.82	438	-1,082	-65
BTC	23,289.50	2,569	-3,876	-325
BUSD	1.00	136,803	-156,580	-1,785
CEL	0.34	1,210,940	-3,287,986	-393,481
COMP	36.75	672	-990	-47
CRV	0.73	3,744	-6,469	0
DASH	43.36	1,447	-1,969	-14,474
DOGE	0.06	3,622,840	-3,756,391	-71,288
DOT	7.11	125,185	-157,632	-7,209
EOS	0.95	27,257	-92,357	-9,423
ETC	15.03	7,339	-8,075	-850
ETH	1,247.65	27,136	-43,084	-2,700
GUSD	1.00	1,954,097	-5,878,716	-67,687
KNC	1.27	37,910	-39,039	-160,995
LINK	6.10	401,654	-603,624	-28,003
LPT	8.55	1,021	-969	0
LTC	44.31	14,060	-22,849	-4,105
LUNA	0.00	26,188,786	-31,128,743	-3,556
MANA	0.86	164,163	-276,053	-4,023
MATIC	0.45	4,955,835	-6,492,778	-298,332
MCDAI	1.00	468,665	-768,045	-5,869
MKR	790.41	0	-3	0
OMG	1.98	5,893	-5,920	-76
PAX	1.00	279,899	-561,857	-11,062
PAXG	1,832.97	308	-2,311	-15
SGB	0.02	558,228	-565,023	-16,427
SNX	1.90	154,363	-204,083	-2,836
SOL	28.83	50,513	-77,543	-2,579
SPARK	0.00	0	-414,442	-23,300
SUSHI	1.00	10,327	-13,506	-1,785
TAUD	0.69	0	0	0
TCAD	0.78	6	-6	0
TGBP	1.21	77,578	-77,578	0
THKD	0.13	0	0	0
TUSD	1.00	276,023	-292,276	-1,657
UMA	2.06	1,378	-2,603	-249
UNI	3.72	25,267	-45,893	-2,516
USDC	1.00	34,162,224	-36,563,371	-1,777,692
USDT ERC20	1.00	1,792,723	-2,301,104	-63,195
UST	0.01	751,920	-699,390	0
WBTC	23,273.00	1	-1	0
XEC	1,820.02	0	0	-111,024
XLM	0.00	2,379,783	-3,152,059	-97,699
XRP	0.11	3,413,682	-3,408,154	-125
XTZ	0.32	31,638	-47,455	0
YFI	1.53	0	0	0
yveCRV-DAO	0.99	0	0	-99
ZEC	0.54	2,431	-2,226	-4,225
ZRX	67.98	179,878	-246,216	0
ZUSD	0.26	0	0	0

Coin	Price	6/15/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$142,217,892	-\$206,040,886	-\$14,467,895
1INCH	0.59	31,221	-36,607	-1,913
AAVE	61.60	1,975	-4,034	-179
ADA	0.51	5,067,955	-8,405,308	-244,358
AVAX	17.05	23,156	-41,369	-1,259
BADGER	3.38	0	-84	0
BAT	0.33	199,913	-2,378,482	-16,291
BCH	123.23	618	-1,092	-34
BNB	221.95	62	-62	-6
BNT	0.72	8,556	-9,451	-927
BSV	53.30	438	-1,082	-65
BTC	21,671.70	2,569	-3,757	-327
BUSD	1.00	136,803	-156,580	-1,785
CEL	0.56	1,210,940	-3,289,258	-393,481
COMP	33.68	672	-990	-47
CRV	0.73	3,744	-6,469	0
DASH	44.15	1,447	-1,969	-14,474
DOGE	0.06	3,622,840	-3,758,676	-71,805
DOT	7.88	125,185	-157,632	-7,486
EOS	0.97	27,257	-92,357	-9,423
ETC	15.14	7,339	-8,078	-851
ETH	1,174.83	27,136	-43,405	-2,669
GUSD	1.00	1,954,097	-5,874,218	-67,780
KNC	1.41	37,910	-39,039	-160,995
LINK	7.01	401,654	-603,656	-28,265
LPT	7.91	1,021	-969	0
LTC	48.44	14,060	-17,190	-4,143
LUNA	0.00	26,188,786	-31,132,476	-3,556
MANA	0.87	164,163	-276,053	-4,023
MATIC	0.41	4,955,835	-6,537,605	-299,217
MCDAI	1.00	468,665	-438,594	-5,869
MKR	783.94	0	-3	0
OMG	1.92	5,893	-5,920	-76
PAX	1.00	279,899	-561,879	-11,062
PAXG	1,839.94	308	-2,311	-15
SGB	0.03	558,228	-565,023	-16,427
SNX	1.83	154,363	-204,398	-2,836
SOL	31.57	50,513	-77,585	-2,619
SPARK	0.00	0	-414,442	-23,300
SUSHI	1.04	10,327	-14,423	-1,785
TAUD	0.70	0	0	0
TCAD	0.78	6	-6	0
TGBP	1.22	77,578	-77,578	0
THKD	0.13	0	0	0
TUSD	1.00	276,023	-292,272	-1,657
UMA	2.70	1,378	-2,603	-249
UNI	4.16	25,267	-45,893	-2,516
USDC	1.00	34,162,224	-36,731,110	-1,799,513
USDT ERC20	1.00	1,792,723	-2,202,613	-63,589
UST	0.01	751,920	-699,438	0
WBTC	21,745.00	1	-1	0
XEC	1,841.16	0	0	-111,024
XLM	0.00	2,379,783	-4,179,754	-97,699
XRP	0.11	3,413,682	-3,408,500	-125
XTZ	0.33	31,638	-47,455	0
YFI	1.44	0	0	0
yveCRV-DAO	1.00	0	0	-99
ZEC	0.51	2,431	-2,359	-4,225
ZRX	67.24	179,878	-246,216	0
ZUSD	0.26	1	0	0

Coin	Price	6/17/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$136,841,941	-\$201,233,568	-\$13,876,177
1INCH	0.59	31,221	-36,607	-1,913
AAVE	57.35	2,041	-4,034	-179
ADA	0.49	5,067,955	-8,405,153	-244,358
AVAX	16.22	23,156	-41,531	-1,272
BADGER	3.17	0	-84	0
BAT	0.34	199,913	-2,378,482	-16,291
BCH	120.75	618	-1,092	-34
BNB	216.57	62	-62	-6
BNT	0.56	8,556	-9,451	-927
BSV	54.60	438	-1,082	-65
BTC	20,640.16	2,569	-3,837	-327
BUSD	1.00	136,803	-156,580	-1,785
CEL	0.59	1,210,940	-3,291,296	-393,481
COMP	32.68	672	-990	-47
CRV	0.66	3,744	-6,469	0
DASH	43.71	1,447	-1,969	-14,474
DOGE	0.06	3,622,840	-3,760,404	-72,360
DOT	7.38	125,185	-158,350	-7,486
EOS	0.94	27,257	-92,357	-9,423
ETC	14.38	7,339	-8,080	-851
ETH	1,094.57	27,136	-44,622	-2,670
GUSD	1.00	1,954,097	-5,873,206	-68,087
KNC	1.37	37,910	-39,039	-160,995
LINK	6.43	401,654	-619,161	-28,265
LPT	7.70	1,021	-971	0
LTC	47.10	14,060	-17,193	-4,144
LUNA	0.00	26,188,786	-31,133,425	-3,556
MANA	0.85	164,163	-284,998	-4,023
MATIC	0.40	4,955,835	-6,537,655	-299,217
MCDAI	1.00	468,665	-437,594	-5,869
MKR	773.75	0	-3	0
OMG	1.87	5,893	-5,920	-76
PAX	1.01	279,899	-561,358	-11,061
PAXG	1,845.16	308	-2,315	-15
SGB	0.03	558,228	-565,023	-16,427
SNX	1.73	154,363	-204,403	-2,836
SOL	31.57	50,513	-77,587	-2,619
SPARK	0.00	0	-414,442	-23,300
SUSHI	1.02	10,327	-14,423	-1,785
TAUD	0.69	0	0	0
TCAD	0.77	6	-6	0
TGBP	1.22	77,578	-77,578	0
THKD	0.13	0	0	0
TUSD	1.00	276,023	-291,144	-1,657
UMA	2.70	1,378	-2,603	-249
UNI	3.97	25,267	-45,893	-2,516
USDC	1.00	34,162,224	-36,883,438	-1,807,029
USDT ERC20	1.00	1,792,723	-2,195,789	-63,588
UST	0.01	751,920	-699,487	0
WBTC	20,677.00	1	-1	0
XEC	1,841.44	0	0	-111,024
XLM	0.00	2,379,783	-4,219,788	-97,699
XRP	0.11	3,413,682	-3,408,516	-125
XTZ	0.32	31,638	-47,455	0
YFI	1.40	0	0	0
yveCRV-DAO	0.99	0	0	-99
ZEC	0.45	2,431	-2,275	-4,225
ZRX	63.27	179,878	-246,291	0
ZUSD	0.27	1	0	0

Coin	Price	6/20/2022		
		Custody		Withhold
		Assets (on Fireblocks)	Liabilities (in the books)	Liabilities
		\$137,577,456	-\$205,258,115	-\$14,161,381
1INCH	0.67	31,221	-36,607	-1,913
AAVE	60.06	2,041	-4,042	-179
ADA	0.49	5,067,955	-8,422,943	-244,358
AVAX	16.83	23,156	-41,682	-1,290
BADGER	3.16	0	-84	0
BAT	0.36	199,913	-2,378,482	-16,291
BCH	119.10	618	-1,092	-34
BNB	214.08	62	-62	-6
BNT	0.52	8,556	-9,451	-927
BSV	63.87	438	-1,082	-65
BTC	20,397.50	2,569	-3,777	-332
BUSD	1.00	136,803	-156,580	-1,785
CEL	0.96	1,210,940	-3,292,384	-393,481
COMP	34.30	672	-990	-47
CRV	0.68	3,744	-6,469	0
DASH	45.03	1,447	-1,969	-14,474
DOGE	0.06	3,622,840	-3,780,825	-72,565
DOT	7.70	125,185	-160,897	-7,486
EOS	0.95	27,257	-92,357	-9,423
ETC	15.93	7,339	-8,234	-854
ETH	1,105.02	27,136	-46,912	-2,702
GUSD	1.00	1,954,097	-5,893,003	-67,782
KNC	1.27	37,910	-39,039	-160,995
LINK	6.89	401,654	-619,172	-28,265
LPT	7.81	1,021	-971	0
LTC	52.00	14,060	-17,368	-4,144
LUNA	0.00	26,188,786	-31,133,425	-3,556
MANA	0.82	164,163	-284,998	-4,023
MATIC	0.39	4,955,835	-6,625,020	-299,217
MCDAI	1.00	468,665	-549,387	-5,869
MKR	891.74	0	-3	0
OMG	1.83	5,893	-5,920	-76
PAX	1.00	279,899	-561,358	-11,061
PAXG	1,845.27	308	-2,315	-15
SGB	0.03	558,228	-565,023	-16,427
SNX	2.93	154,363	-204,442	-2,836
SOL	34.40	50,513	-77,687	-2,619
SPARK	0.00	0	-414,442	-23,300
SUSHI	1.09	10,327	-14,423	-1,785
TAUD	0.70	0	0	0
TCAD	0.77	6	-6	0
TGBP	1.22	77,578	-77,578	0
THKD	0.13	0	0	0
TUSD	1.00	276,023	-291,144	-1,657
UMA	2.45	1,378	-2,603	-249
UNI	4.17	25,267	-45,893	-2,516
USDC	1.00	34,162,224	-37,759,827	-1,806,412
USDT ERC20	1.00	1,792,723	-2,139,250	-63,580
UST	0.01	751,920	-699,487	0
WBTC	20,433.00	1	-1	0
XEC	1,840.92	0	0	-111,024
XLM	0.00	2,379,783	-4,219,813	-97,699
XRP	0.11	3,413,682	-3,408,542	-125
XTZ	0.32	31,638	-47,455	0
YFI	1.42	0	0	0
yveCRV-DAO	1.00	0	0	-99
ZEC	0.49	2,431	-2,256	-4,225
ZRX	65.20	179,878	-246,291	0
ZUSD	0.27	1	0	0

Exhibit B

Coin Type	Number of Coins Withdrawn from Custody Program	Number of Coins Withdrawn from Withhold Account
BTC	269.6213	30.6049
DASH	0	14,333.5300
ETH	4,694.0848	115.5844
GUSD	1,264,999.0000	0
KNC	0	152,371.3000
LINK	125,933.5000	0
LTC	0	3,478.3632
PAX	176,236.0000	0
PAXG	201.2964	0
USDC	847,219.4700	0
USDT	215,675.0000	0